

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No.
)	
TWO PIECES OF)	
MISCELLANEOUS JEWELRY,)	
)	
Defendants.)	

VERIFIED COMPLAINT OF FORFEITURE

Comes now plaintiff, United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Stephen Casey, Assistant United States Attorney, for said district, and in a civil cause of action for forfeiture respectfully states as follows:

1. In this *in rem* civil action the United States seeks forfeiture of certain property, currently in the possession and custody of the plaintiff pursuant to the provisions of Title 21, United States Code, Section 881.
2. Subject Matter Jurisdiction of this Court is based on Title 28, United States Code, Sections 1345, 1355(a), and Title 21, United States Code, Section 881. *In rem* jurisdiction is based on Title 28, United States Code, Section 1355. Venue is proper in this district pursuant to Title 28, United States Code, Sections 1355 & 1395 and Title 21, United States Code, Section 881(j).
3. The defendant property was furnished or intended to be furnished in exchange for controlled substances in violation of the Controlled Substances Act, Title 21, United States Code, Section 801 *et seq.*, was proceeds traceable to such an exchange, and was used or intended to be

used to facilitate such an exchange. The defendant property is therefore subject to forfeiture to the United States of America, under the provisions of Title 21, United States Code, Section 881(a)(6).

4. The defendant property was seized in the Eastern District of Missouri and is now, and during the pendency of this action will be in the jurisdiction of this court.

5. On or about May 22, 2013, the defendant jewelry was seized from Erica Davis by the Federal Bureau of Investigation. The defendant jewelry is more particularly described as follows:

- a) One Counterfeit Breitling 10 Karat Gold & Diamond Watch, Set with 216 Full-Cut Diamonds, S/N A25363; and
- a) One 14 Karat White Gold Single Post/Pierced Diamond Cluster Earring with 5 Diamonds.

6. The plaintiff alleges the defendant jewelry is subject to forfeiture and for its reasons states as follows:

7. A joint investigation conducted by the Federal Bureau of Investigation, the Drug Enforcement Administration, Maryland Heights Police Department and St. Louis Metropolitan Police Department identified multiple individuals involved in a drug distribution network operating in and around the St. Louis area. During this investigation, investigators identified Henry Dabney as a member of the distribution organization.

8. Investigators have utilized source information, law-enforcement surveillance operations, statements made by individuals as part of this investigation, and other investigative procedures to identify the extent of Dabney's involvement in the drug trafficking enterprise.

9. On April 13, 2012, Henry Dabney recounted to the Maryland Heights Police an incident in which three unidentified armed males forced their way into a residence Dabney was

at and kidnapped Dabney, threatening to kill him unless Dabney gave them his watch and cash. Dabney told police during an interview of the incident that he used to be a drug dealer, so people thought he was wealthy. During the interview, Dabney recounted an incident in which he and another individual identified as Darrion Williams made an arrangement to purchase a large amount of drugs. Dabney failed to show up with the \$150,000 for the deal, the other dealers killed Williams. Dabney stated that he kept the \$150,000 and used some of that money to start a business and to purchase a Breitling watch in New York City for \$40,000. Dabney further stated he routinely carries about \$10,000 in cash.

10. Pursuant to information developed during the drug trafficking investigation, on May 22, 2012, a Federal Search Warrant was executed at the residence of Erica Davis. Davis is the girlfriend of Dabney. Information developed during prior surveillance has revealed Dabney used his girlfriend's residence as one of his bases of operation. During the search, investigators seized a loaded handgun, a Man's Breitling Watch, and a 14k gold diamond stud earring.

11. An employment check of Dabney has revealed he has been unemployed since December of 2010. An investigation into Dabney's financial records, including his purchases of properties and vehicles, as well as statements made by Dabney himself indicates that he has cash substantially above his means.

12. The only people known to have any possible interests in the defendant property are Henry Dabney and Erica Davis.

13. By reason of these premises, the defendant property is subject to forfeiture to the United States, pursuant to the provisions of Title 21, United States Code, Section 881.

WHEREFORE, Plaintiff prays that a Warrant for Arrest be issued for the defendant property and the defendant property be condemned and forfeited to the United States of America, in accordance with the provisions of law; and that the plaintiff be awarded its costs in this action, and have such other relief as provided by law and the nature of the case may require.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

/s/ Stephen Casey

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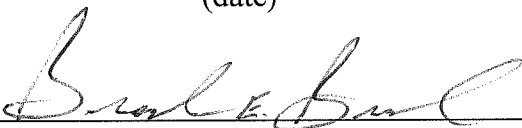
VERIFICATION

I, Special Agent Brandon E. Burke, hereby verify and declare under penalty of perjury that I am a Special Agent with the United States Federal Bureau of Investigation, that I have read the foregoing Verified Complaint *in rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent of the Federal Bureau of Investigation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 3/5/2014
(date)



BRANDON E. BURKE
Special Agent
Federal Bureau of Investigation